

EXHIBIT C

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

**SCOTT D. DALESANDRO, et al.,
On behalf of themselves and
all others similarly situated,**

Plaintiffs,

v.

**THE INTERNATIONAL PAPER
COMPANY,**

Defendant.

Case No.: C-1-01-109

Judge Sandra S. Beckwith

DECLARATION OF THERESA L. GROH

I, Theresa L. Groh, under penalty of perjury pursuant to 28 U.S.C. 1746, declare as follows:

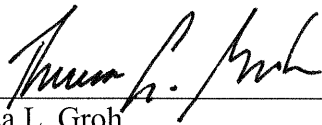
1. I supervised the implementation of the notice plan that was set forth in the Settlement Agreement and in the parties' Joint Motion for Preliminary Approval in this case.
2. On September 27, 2005 I mailed a copy of the Notice Materials by First Class U.S. Mail to the last known address of each Class Member. I used the address information contained in Defendant's employment records and in my records which I had updated from time to time when Class Members contacted me with address changes in the years that this litigation has been pending. Moreover, I had previously sent notice to these same Class Members using this address information and had achieved a successful delivery to all but one Class Member.
3. Upon the receipt of the few undeliverable Notice Materials returned by the postal service, I used Class Representative Diane Noonan, other Class Members, a National Change of

Address database, and other internet resources to obtain updated address information. I then resent the Notice Materials until there were no returns from the postal service.

4. As of this date of this Declaration, I have received no written objections and no notices that a Class Member or his or her attorney will be appearing at the Fairness Hearing on November 16, 2005.

5. As of the date of this Declaration I have received 100 signed Releases.

So declared this 7th day of November 2005, Cincinnati, Ohio.



Theresa L. Groh